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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,
ex rel. MARK GASKILL
Plaintiffs,

vs.

NORTHWEST COMMUNITY ACTION PROGRAM
OF WYOMING INC.

Defendant.

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Civil Action No.

16-cv-201J

**STIPULATED MOTION TO
EXTEND TIME FOR FILING OF
DISMISSAL AND SETTLEMENT
DOCUMENTS**

The Parties to this case, by and through Counsel, hereby move the Court for an extension of time for up to 90 days, (to October 14, 2020) to submit final settlement and dismissal documents to the Court. This motion is required due to the nature of actions under the False Claims Act, , 31 U.S.C. § 3729 et seq.

In order to effectuate the settlement, the parties must develop and exchange a number of documents and complete certain negotiations. These include a settlement between the litigating parties (Relator Gaskill and Defendant NOWCAP). However, the agreement is then subject to approval and concurrence by the United States Department of Justice, (DOJ) which has its own required components of the settlement document. Additionally, the Relator and DOJ must either agree on a Relators' Share of the settlement amount, or agree to submit it to the Court for determination. A separate document must be executed on the amount of statutory attorneys' fees and costs are to be included in any settlement. (While this is not in dispute, the documents must still be processed and executed by the DOJ).

Due to the need for these documents to be drafted, submitted for approval to all parties, and the DOJ, it has not been possible to accomplish this in the 30 days entered by the Clerk upon notice to the Court of the settlement between Relator and NOWCAP. The parties agree that this extension is an outside limit of the time needed and will diligently pursue producing and approving documents well in advance of that time.

STIPULATION

For the foregoing reasons, the Parties through their respective counsel stipulate that the court grant an extension of time for up to 90 days, (to October 14, 2020) to submit final settlement and dismissal documents to the Court.

Dated : July 15, 2020

_____/S/_____
Robert D. Sherlock (admitted pro hac vice)
EISENBERG, CUTT, KENDELL & OLSEN
Attorneys for Qui Tam Plaintiff/Relator

_____/S/_____
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_____/S/_____
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UNITED STATES ATTORNEY'S OFFICE
Attorney for United States of America

CERTIFICATION

I, ROBERT D. SHERLOCK, am an attorney in the law firm of Eisenberg, Cutt Kendell & Olsen, counsel of record for Relator-Plaintiff Mark Gaskill. I hereby attest that all other signatories on whose behalf this filing is submitted concurred in writing via e-mail with this filing.

Dated: July 15, 2020

EISENBERG, CUTT, KENDELL & OLSEN

_____/s/_____
Robert D. Sherlock
Robert D. Sherlock
Attorneys for Plaintiff-Relator
Mark Gaskill

CERTIFICATE OF SERVICE

I hereby certify that I am an attorney at Eisenberg, Cutt, Kendell & Olsen. My business address is 215 S. State Street, Suite 900, Salt Lake City, Utah 84111. I am over the age of eighteen years and not a party to the above-titled action. I certify that on July 15, 2020 a true and correct copy of the following document was served on the following recipients via CM/ECF, the Court's electronic transmission system, and via email:

STIPULATED MOTION TO EXTEND TIME FOR FILING OF DISMISSAL AND SETTLEMENT DOCUMENTS

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: July 17, 2018

/s/ Robert D. Sherlock
Robert D. Sherlock